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INTEROFFICE CORRESPONDENCE

DATE: July 20, 1990

CWA-LAD-316-90

TO: D. W. Ferrera, Support Services, Building 111

FROM: J. E. Evered, Environmental Restoration, Building T130B, x4394

SUBJECT: HERBICIDE USAGE/WEED CONTROL

We have reviewed your letter of June 14, 1990, concerning the problems associated with weed control by mechanical means and the suggestions on usage of certain herbicides. In considering your proposals we have reviewed the past uses of herbicides on plantsite and their consequences. Some background information is summarized for you.

During the FBI investigation in June 1989, triazine herbicides, specifically Atrazine and Simazine, were found in low amounts in Ponds A-4, B-5 and C-2. These herbicides were approved by and applied in accordance with EPA guidelines and methods. However, the presence of these chemicals in waters which would eventually be discharged into Great Western Reservoir and Standley Lake raised concern by the Colorado Department of Health (CDH). As a result of this concern, Rocky Flats opted to treat the waters with granular activated carbon (GAC) treatment units prior to offsite discharge even though there is no accepted standard for maximum concentration of these herbicides in surface waters. In January 1990, the three terminal ponds were sampled to determine the levels of these same herbicides. Levels lower than those found in June, 1989, were found to be present in Ponds A-4 and B-5 for both Atrazine and Simazine. Pond C-2 levels for Atrazine were barely detectable and Simazine was not detected at all in C-2. However, Rocky Flats again used granular activated carbon treatment units to treat water prior to offsite discharge. The current average monthly cost for treatment of all the terminal ponds prior to discharge is \$1,000,000.

Use of "Rodeo", "Roundup", and "Banvel" to control weeds in and around the PSZ and other areas of plantsite, while EPA approved, must be avoided because of the possibility of residue from the original chemicals or by-products of their degradation entering the surface waters. Runoff from the plantsite is collected in Ponds A-4, B-5 and C-2. Any residual chemicals or by-products of degradation will undoubtedly be found by sample analysis.

The Colorado Department of Health has requested advance notification for any application of herbicides so that they may factor such use into their monitoring plan for the plantsite. Knowing how extreme the attitudes of CDH can be concerning any aspect of Rocky Flats, there is a strong probability that they will require RFP to treat all waters discharged no matter what herbicides are used.

We understand your concern about the restrictive use of herbicides on plantsite this growing season and are actively considering alternatives to herbicide usage. One alternative currently under consideration is burning. In former years, burning of weeds along fence lines and in the razor wire of the PSZ was a very effective weed control method. The Colorado Department of Health and DOE have been contacted to determine if this method of weed control may be reinstated.

ADMIN RECORD

SW-A-002947

D. W. Ferrera
July 19, 1990
CWA-LAD-316-90
Page 2

An open burning permit has been prepared by the Clean Water Act Division and was forwarded to Plant Services for submittal to CDH. We anticipate a favorable reply.

If you have any questions please do not hesitate to call Leslie Dunstan on extension 5743.

LD:sb

cc:

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